

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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In the Matter of )

Global NAPs, Inc. )

Petition for Arbitration Pursuant to Section 252(b) )  
of the Telecommunications Act of 1996 to )  
Establish an Interconnection Agreement with )  
Verizon New England Inc. d/b/a Verizon )  
Massachusetts f/k/a New England Telephone and )  
Telegraph Company d/b/a Bell Atlantic- )  
Massachusetts )

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D.T.E. 02-45

**JOINT MOTION FOR EXTENSION OF TIME**

Verizon New England Inc., d/b/a Verizon Massachusetts (“Verizon MA”) and Global NAPs, Inc. (“GNAPs”) (collectively referred to hereafter as “the Parties”) file this motion for an extension pursuant to 220 CMR 1.02(5). In support of this motion the Parties state as follows:

(1) On December 12, 2002, the Department entered a written decision and order addressing the issues that were the subject of arbitration in this docket. *See* Decision and Order, Petition of Global NAPs, Inc. pursuant to Section 252(b) of the Telecommunications Act of 1996, for arbitration to establish an interconnection agreement with Verizon New England, Inc. d/b/a Verizon Massachusetts f/k/a New England Telephone and Telegraph Co. d/b/a Bell Atlantic-Massachusetts, D.T.E. 02-45 (December 12, 2002) (“Arbitration Decision”).

(2) In the Arbitration Decision, the Department ordered the parties to incorporate the Department’s determinations set forth therein into a final interconnection agreement containing both the negotiated and arbitrated terms and conditions and file that final interconnection

agreement pursuant to Section 252(e)(1) of the Telecommunications Act of 1996 within 21 days. *See Arbitration Decision* at 77. The parties are currently required to file the final interconnection agreement on or before January 2, 2003.

(3) Since the Arbitration Decision, the parties have worked diligently to prepare the final interconnection agreement and continue to do so. However, the parties need additional time beyond the current deadline (January 2, 2003) to complete the new interconnection agreement.

(4) The upcoming holidays will significantly reduce the time actually available to complete the new interconnection agreement prior to the current deadline.

(5) A fifteen day extension should provide the Parties with the time required to complete the new interconnection agreement and submit it to the Commission for its final approval.

WHEREFORE, for all of the foregoing reasons, the Parties respectfully request that the Commission grant their motion for an extension of the due date for filing the above referenced final interconnection agreement to January 17, 2003.

Respectfully submitted,

VERIZON MASSACHUSETTS

By: /s/Keefe B. Clemons  
Keefe B. Clemons, Attorney for Verizon Massachusetts

December 19, 2002  
Date

GLOBAL NAPS, INC.

By: /s/James R. J. Scheltema  
James R. J. Scheltema

December 19, 2002  
Date